



California Regional Water Quality Control Board

Santa Ana Region



Alan C. Lloyd Ph.D.
Agency Secretary

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Arnold Schwarzenegger
Governor

April 10, 2006

Mr. Darren Newton
BRAC Environmental Coordinator
Marine Corps Air Station El Toro
Base Realignment and Closure
7040 Trabuco Road
Irvine, CA 92618

COMMENTS ON DRAFT FINDING OF SUITABILITY FOR EARLY TRANSFER FOR A PORTION OF PARCEL 24 (EARLY TRANSFER PARCEL 24-1) WITHIN CARVE-OUT 5, AND INTERIM COVENANT TO RESTRICT USE OF PROPERTY, ENVIRONMENTAL RESTRICTION FORMER MARINE CORPS AIR STATION, TUSTIN

Dear Mr. Newton:

We have completed our review of the above-referenced documents, dated February 27, 2006, which we received on February 28, 2006. We have the following comments:

COMMENTS ON DRAFT FINDING OF SUITABILITY FOR EARLY TRANSFER FOR A PORTION OF PARCEL 24 (EARLY TRANSFER PARCEL 24-1) WITHIN CARVE-OUT 5

1. Table 2, Evaluation Summary of Environmental Factors for ETP 24-1

The statement under the section labeled “polychlorinated biphenyls (PCBs)” is not completely correct. The 1995 remedial investigation and the 1997 soil removal action detected PCBs in the soil at site IRP-13W. The contaminated soil was removed from the site between June and September 1997 (see April 28, 1998, Draft Closure Report, Soil Removal Action at Site IRP-13W, Drum Storage Area number 3). We concurred with the Navy’s request for no further action for the soil at IRP-13W on August 18, 1998.

2. Table 5, Summary of Environmental Activities at IRP-13W.

Trichloroethylene (TCE) was not the only chemical found in the soil at this site. According to the 1997 Remedial Investigation Report, the removal action conducted in 1997 was driven by the presence of polynuclear aromatic hydrocarbon benzo[a]pyrene. PCBs were also detected during the removal action.

3. Attachment 3a, Hazardous Substance Notification Table and 3b, Petroleum Substance Notification Table

The information in the boxes under the column "Activities Conducted at Site" is incomplete. Certain chemicals were stored at each of these sites, and at some of these locations, the chemicals were released to the environment. The historical use of each site, as well as a description of any known a release of hazardous substances or petroleum at the site, should be documented in this portion of the report.

COMMENTS ON INTERIM COVENANT TO RESTRICT USE OF PROPERTY, ENVIRONMENTAL RESTRICTION**1. Page 10, Section 4.02, Soil and Groundwater Management, (v)**

The RWQCB does not regulate the use of groundwater for drinking water. The California Department of Health Services, Division of Drinking Water and Environmental Management, regulates whether the water is appropriate for distribution and use as drinking water.

Orange County Well Ordinance (County Ordinance No. 2607) requires that a permit be obtained prior to the construction or destruction of any well. A permit can be obtain from the Orange County Health Care Agency, Environmental Health Water Quality Program. If one wishes to extract and use groundwater in Orange County, the Orange County Water District requires the payment of fees for replacement of the groundwater.

If you should have any questions, please call me at (951) 782-4498, or send e-mail to phannon@waterboards.ca.gov.

Sincerely,

Original signed by

Patricia A. Hannon
SLIC/DoD Section

cc: Mr. (Ram) Anantaraman Peddada, Dept. of Toxic Substances Control
Mr. Randy Kiefer, BRAC Program Management Office West
Mr. James Ricks, U. S. EPA, Region IX
Roy Herndon, OCWD
Well Permitting, Orange County Health Care Agency, Environmental Health, Water Quality Program